

Fill in this information to identify the case:

Debtor 1 Joseph John Pinetti

Debtor 2 Valarie Elaine Pinetti  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of PA  
(State)

Case number 14-10787-TPA

## Form 4100R

# Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: Carrington Mortgage Services, LLC Court claim no. (if known): 4-1

Last 4 digits of any number you use to identify the debtor's account: 6 1 8 7

Property address: 6852 Garfield Ave  
Number Street

Harborcreek PA 16421  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 12 / 01 / 2019  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

     /      /       
MM / DD / YYYY

Debtor 1 Joseph John Pinetti  
First Name Middle Name Last Name

Case number (if known) 14-10787-TPA

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Lee Raphael  
Signature

Date 10/29/2019

Print Lee Raphael  
First Name Middle Name Last Name

Title Attorney

Company Prober & Raphael, A Law Corporation

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 20750 Ventura Blvd, Suite 100  
Number Street

Woodland Hills CA 91364  
City State ZIP Code

Contact phone (818) 227-0100

Email cmartin@pralc.com

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I, Roger Soria, certify that I am a resident of the County aforesaid; I am over the age of 18 years and not a party to the within action; my business address is 20750 Ventura Boulevard, Suite 100, Woodland Hills, California 91364.

On 10/29/2019, I served the within STATEMENT IN RESPONSE TO NOTICE OF FINAL CURE PAYMENT on all interested parties in this proceeding by placing true and correct copy thereof enclosed in a sealed envelope with postage prepaid in the United States Mail at Woodland Hills, California, addressed as follows:

Joseph John Pinetti  
528 Montroyale Drive  
Erie, PA 16504

Valarie Elaine Pinetti  
6852 Garfield Ave.  
Harborcreek, PA 16421

Michael S. Jan Janin  
Quinn Buseck Leemhuis Toohey & Kroto Inc  
2222 West Grandview Boulevard  
Erie, PA 16506-4508

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

I declare that I am employed in the office of a member of the Bar at whose direction this service was made.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 10/29/2019 at Woodland Hills, California.

/s/ Roger Soria